

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

MATTHEW STEIN and JEROME LHOTE,  
  
Plaintiffs,  
  
v.  
  
SKATTEFORVALTNINGEN,  
  
Defendant.

---

23 Civ. 2508 (NRB)

---

SKATTEFORVALTNINGEN,  
  
Counterclaim Plaintiff,  
  
v.  
  
MATTHEW STEIN, JEROME LHOTE, and  
LUKE MCGEE  
  
Counterclaim Defendants.

---

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, dated July 13, 2023, and the appendix thereto, the accompanying Declaration of Daniel W. Levy, sworn to on July 13, 2023, together with the Exhibits thereto, and all of the prior proceedings had within the above-referenced action, Plaintiffs Matthew Stein and Jerome Lhote, by and through their undersigned attorneys, will move this Court on a date and time to be determined by the Court, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 21A, New York, New York, before the Honorable Naomi Reice Buchwald, United

States District Judge, for an Order dismissing the amended counterclaims alleged by Defendant-Counterclaimant Skatteforvaltningen (ECF No. 48).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Court's Order, dated May 23, 2023 (ECF No. 45), the deadline for Defendant-Counterclaimant Skatteforvaltningen to file any opposition to the motion to dismiss is on or before 21 days from July 13, 2023.

Dated: New York, New York  
July 13, 2023

Respectfully submitted,

McKool Smith P.C.

/s/

By: \_\_\_\_\_  
Daniel W. Levy  
dlevy@mckoolsmith.com  
One Manhattan West  
395 Ninth Avenue, 50th Floor  
New York, New York 10001-8603  
Telephone: (212) 402-9400

*Attorneys for Plaintiffs-Counterclaim  
Defendants Matthew Stein and  
Jerome Lhote*

To: Marc A. Weinstein  
William R. Maguire  
Neil J. Oxford  
Dustin P. Smith  
John T. McGoeys  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza  
New York, New York 10004-1482

*Attorneys for Defendant-Counterclaimant  
Skatteforvaltningen*

Robert H. Pees  
Anne M. Evans  
Ilana R. Roberts  
Akin Gump Strauss Hauer & Feld LLP

Daniel S. Newman  
Justin Kaplan  
Nelson Mullins Riley & Scarborough

*Attorneys for Counterclaim Defendant*  
*Luke McGee*